

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MALEEHA AHMAD, et al.,

Plaintiffs,

V.

CITY OF ST. LOUIS,

Defendant.

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Case No. 4:17-CV-2455-RLW

DEFENDANT CITY OF ST. LOUIS'S WITNESS LIST

Defendant City of St. Louis hereby submits the following witness list in advance of the hearing on Plaintiffs' motion for preliminary injunction:

I. Witnesses

1. Sergeant Randy Jemerson

Sgt. Jemerson is a police officer who was present at the protests which occurred during the weekend of September 15, 2017. He will testify regarding the nature of the protests including illegal actions he witnessed or was aware of, including property damage, assaults on law enforcement officers, resisting arrest, and refusal to disperse. He will testify regarding warnings provided to the protesters and police tactics used for maintaining order, and safety for the public and officers.

2. Sergeant Brian Rossomanno.

Sgt. Rossomanno is a police officer who was present at the protests which occurred during the weekend of September 15, 2017. He will testify regarding the nature of the protests including illegal actions he witnessed

or was aware of, including property damage, assaults on law enforcement officers, resisting arrest, and refusal to disperse. He will testify regarding warnings provided to the protesters and police tactics used for maintaining order, and safety for the public and officers.

3. Lieutenant Scott Boyher.

Lt. Boyher is a police officer in command of the Bicycle Response Team who was present at the protests which occurred during the weekend of September 15, 2017. He will testify regarding the nature of the protests including illegal actions he witnessed or was aware of, including property damage, assaults on law enforcement officers, resisting arrest, and refusal to disperse. He will testify regarding warnings provided to the protesters and police tactics used for maintaining order, and safety for the public and officers.

4. Sergeant Matthew Karnowski.

Sgt. Karnowski is a police officer in command of the Bicycle Response Team who was present at the protests which occurred during the weekend of September 15, 2017. He will testify regarding the nature of the protests including illegal actions he witnessed or was aware of, including property damage, assaults on law enforcement officers, resisting arrest, and refusal to disperse. He will testify regarding warnings provided to the protesters and police tactics used for maintaining order, and safety for the public and officers.

5. Lieutenant Timothy Sachs.

Lt. Sachs is a Commander with the police department's Civil Disobedience Team. He will testify regarding the police department's policy regarding the deployment of chemical agents for crowd dispersal. He will also testify regarding the police department's policy for recording of police activity. Lt. Sachs will also testify regarding the nature of the protests including illegal actions he witnessed or was aware of, including property damage, assaults on law enforcement officers, resisting arrest, and refusal to disperse. He will testify regarding warnings provided to the protesters and police tactics used for maintaining order, and safety for the public and officers.

Defendant City reserves the right to call any other witnesses as may be necessary to rebut, respond to, or impeach the testimony of the witnesses called by Plaintiffs during the hearing.

Respectfully submitted,

JULIAN BUSH,
City Counselor

/s/ Thomas R. McDonnell

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Attorneys for Defendant City of St. Louis

CERTIFICATE OF SERVICE

I hereby certify that on October 12, 2017, the foregoing **Defendant City of St. Louis's Witness List** was served via the Court's electronic filing system upon all counsel of record.

/s/ Thomas R. McDonnell